



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**FILED**

11-06-06

11:52 AM

Order Instituting Rulemaking Into )  
Implementation of Federal Communications ) R.04-12-001  
Commission Report and Order 04-87, As It )  
Affects The Universal Lifeline Telephone Service )  
Program. )  
\_\_\_\_\_ )

**COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A  
AT&T CALIFORNIA (U 1001 C) ON ASSIGNED COMMISSIONER'S RULING**

ANNA KAPETANAKOS

525 Market Street, Room 2024

San Francisco, CA 94105

Ph: 415-778-1480

Fax: 415-543-0418

E-Mail: [anna.kapetanakos@att.com](mailto:anna.kapetanakos@att.com)

Attorney for AT&T California

November 6, 2006

Pursuant to Ordering Paragraph No. 5 of the Assigned Commissioner's Ruling temporarily suspending portions of General Order 153 relating to the annual ULTS/California Lifeline verification process ("ACR"), issued November 1, 2006, Pacific Bell Telephone Company, dba AT&T California ("AT&T California"), submits these Comments.

**I. AT&T California supports temporary suspension of portions of General Order ("GO") 153.**

AT&T California agrees with the Commission's temporary suspension of portions of GO 153 relating to the annual verification process. The ACR reflects Commissioner Grueneich and Commission staff's commitment to timely resolve systemic problems with California Lifeline's verification process that have plagued customers' ability to participate in the program.

As described accurately in the ACR, the new verification process has caused the unfair disqualification of thousands of Ca Lifeline customers because they failed to either respond to or timely return the California Lifeline verification form mailed to them. Suspending the relevant portion of GO 153 and reinstating these disqualified customers onto the program is the best approach for reevaluating the verification process and improving its administration.

However, reinstating these customers is a complicated matter. There are a number of logistical issues that must also be addressed upon implementation of the ACR in order to prevent further inconvenience to California Lifeline participants. For example, in accordance with Section 8.1.3 of GO 153, all customers being placed onto the California Lifeline program must pay a conversion charge. Requiring customers to comply with Section 8.1.3 upon reinstatement under the current circumstances is unfair and should be waived. AT&T California believes that this logistical issue, as well as many others, can be resolved either immediately with the direction of Commission staff or through the anticipated workshop ordered in the ACR.<sup>1</sup>

---

<sup>1</sup> The workshop would also provide an opportunity to review and improve aspects of the certification process as well as the appeals process for both verifications and certifications, which parallel the problems faced by the verification process.

## II. CONCLUSION

AT&T California looks forward to working with Commission staff, Solix and all interested parties to resolve these administrative problems with California Lifeline implementation. The Commission's decision to temporarily suspend the related rules of GO 153 is appropriate and essential to relieve the unfair burden imposed first and foremost on the California Lifeline customers, but also borne by the entities who serve them.

Dated at San Francisco, California, this 6<sup>th</sup> day of November 2006.

Respectfully submitted,

/s/  
ANNA KAPETANAKOS

525 Market Street, Room 2024  
San Francisco, CA 94105  
Ph: 415-778-1480  
Fax: 415-543-0418  
E-Mail: [anna.kapetanakos@att.com](mailto:anna.kapetanakos@att.com)

Attorney for AT&T California

404558

**CERTIFICATE OF SERVICE**

I, Thomas J. Selhorst, hereby certify that I have this day served a copy of the foregoing  
**COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T**  
**CALIFORNIA (U 1001 C) ON ASSIGNED COMMISSIONER'S RULING** on all persons  
on the official service List in R.04-12-001, via e-mail, hand-delivery and/or first-class U.S. Mail.

Executed this 6th day of November 2006 in San Francisco, California.

AT&T CALIFORNIA  
525 Market Street  
San Francisco, CA 94105

/s/

---

Thomas J. Selhorst

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

**Proceeding: R0412001 - CPUC-ILECS, CLECS -**

**Filer: CPUC - ILECS, CLECS**

**List Name: INITIAL LIST**

**Last changed: November 2, 2006**

[Download the Comma-delimited File](#)  
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

---

## Appearance

JEFF SCHNUR  
NECA SERVICES, INC.  
CA/GS/TU  
80 S. JEFFERSON ROAD  
WHIPPANY, NJ 07981

KIMBERLY KRETCHMER  
CITIZENS TELECOM COS OF  
  
180 S. CLINTON AVENUE  
ROCHESTER, NY 14646-0400

ROSS A. BUNTROCK  
WOMBLE CARLYLE SANDRIDGE & RICE PLLC  
1401 EYE STREET, N.W. SEVENTH FLOOR  
WASHINGTON, DC 20005  
STE. 510

OLIVIA B. WEIN  
ATTORNEY AT LAW  
NATIONAL CONSUMER LAW CENTER  
1001 CONNECTICUT AVE., NW.,  
  
WASHINGTON, DC 20036

SEAN WILSON  
TALK.COM  
12020 SUNRISE VALLEY, STE.250  
RESTON, VA 20191

SHARON THOMAS  
TECHNOLOGIES MANAGEMENT, INC.  
210 N. PARK AVE.  
WINTER PARK, FL 32789

ERIN DAWLEY  
HORNITOS TELEPHONE COMPANY  
PO BOX 5158  
MADISON, WI 53705-0158

PETER GLASS  
SEREN INNOVATIONS, INC.  
15 SOUTH 5TH STREET, STE 500  
MINNEAPOLIS, MN 55402

KRISTIE FLIPPO  
TIME WARNER CONNECT  
15303 DALLAS PARKWAY, SUITE 610  
ADDISON, TX 75001  
STE 100

KARL ANDREW  
REGULATORY AFFAIRS  
SAGE TELECOM, INC.  
805 CENTRAL EXPRESSWAY SO,  
  
ALLEN, TX 75013-2789

GLADYS K. STRONG  
SPECIALIST-REGULATORY  
600 HIDDEN RIDGE - HQE02E88  
IRVING, TX 75038

MICHAEL MORCOM  
VERIZON SELECT SERVICES, INC.  
600 HIDDEN RIDGE, HQE01J016  
IRVING, TX 75038

SARA A. LAUER  
VERIZON WEST COAST  
VERIZON CALIFORNIA, INC.  
600 HIDDEN RIDGE DR., E01E55  
IRVING, TX 75038-2092

MARY PHARO  
VAR TEC TELECOM, INC.  
1600 VICEROY DRIVE  
DALLAS, TX 75235

DAVID MORIARTY  
MEDIA ONE/AT&T BROADBAND  
RELATIONS  
550 CONTINENTAL BLVD.  
EL SEGUNDO, CA 90245

JEFF COMPTON  
VICE RESIDENT CARRIER  
  
TELSCAPE COMMUNICATIONS INC.  
606 EAST HUNTINGTON DRIVE  
MONROVIA, CA 91016

DON EACHUS  
VERIZON CALIFORNIA, INC.  
CA501LB  
112 S. LAKE LINDERO CANYON ROAD  
THOUSAND OAKS, CA 91362

JACQUE LOPEZ  
LEGAL ASSISTANT  
VERIZON CALIFORNIA INC  
CA501LB  
112 LAKEVIEW CANYON ROAD  
THOUSAND OAKS, CA 91362

JESUS G. ROMAN  
VERIZON CALIFORNIA, INC.  
112 S. LAKEVIEW CANYON ROAD, CA501LB  
THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN  
VERIZON CALIFORNIA INC.  
112 S. LAKEVIEW CANYON ROAD  
THOUSAND OAKS, CA 91362

W. LEE BIDDLE  
ATTORNEY AT LAW  
FERRIS & BRITTON, P.C.

JOY C. YAMAGATA  
REGULATORY CASE MANAGER  
SEMPRA UTILITIES

401 WEST A STREET, SUITE 1600  
SAN DIEGO, CA 92101

8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123

DALE DIXON  
ATTORNEY AT LAW  
VYCERA COMMUNICATIONS, INC.  
12750 HIGH BLUFF DRIVE, SUITE 200  
SAN DIEGO, CA 92129

THALIA R. GIETZEN  
VYCERA COMMUNICATION, INC.  
12750 HIGH BLUFF DR., STE.200  
SAN DIEGO, CA 92130-2565

BRIAN PLACKIS CHENG  
BLUE CASA COMMUNICATIONS  
911 OLIVE STREET  
SANTA BARBARA, CA 93101

ERIC WOLFE  
REGULATORY  
DUCOR TELEPHONE COMPANY  
PO BOX 42230  
BAKERSFIELD, CA 93384-2230

DAVE CLARK  
KERMAN TELEPHONE COMPANY  
811 S MADERA AVE.  
KERMAN, CA 93630

LINDA BURTON  
PO BOX 219  
OAKHURST, CA 93644

DAN DOUGLAS  
THE PONDEROSA TELEPHONE CO.  
PO BOX 21  
O'NEALS, CA 93645  
350

CHRISTINE MAILLOUX  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE  
SAN FRANCISCO, CA 94102

MARGARITA GUTIERREZ  
DEPUTY CITY ATTORNEY  
CITY AND COUNTY OF SAN FRANCISCO  
350  
1 DR. CARLTON B. GOODLETT PLACE, RM. 375  
SAN FRANCISCO, CA 94102

REGINA COSTA  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE  
SAN FRANCISCO, CA 94102

ANNA KAPETANAKOS  
ATTORNEY AT LAW  
CALIFORNIA  
AT&T CALIFORNIA  
FLOOR, 4  
525 MARKET STREET, ROOM 2024  
SAN FRANCISCO, CA 94105

GRETA BANKS  
AT&T COMMUNICATIONS OF  
525 MARKET STREET, 18TH  
SAN FRANCISCO, CA 94105

LOUIE DE CARLO  
COMPLIANCE MANAGER  
MCI METRO ACCESS TRANSMISSION SERVICES  
COMPANY  
201 SPEAR STREET, 9TH FLOOR  
922  
SAN FRANCISCO, CA 94105

PETER M. HAYES  
GENERAL MANAGER  
PACIFIC BELL TELEPHONE  
140 NEW MONTGOMERY ST., RM  
SAN FRANCISCO, CA 94105

ROBERT B. RYAN  
SBC  
140 NEW MONTGOMERY, ROOM 1909  
SAN FRANCISCO, CA 94105

GLENN STOVER  
ATTORNEY AT LAW  
STOVER LAW  
221 MAIN STREET, SUITE 800  
SAN FRANCISCO, CA 94105-1906

ENRIQUE GALLARDO  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
RITCHIE & DAY LLP  
SAN FRANCISCO, CA 94111  
900

JOHN L. CLARK  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI  
505 SANSOME STREET, SUITE  
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER  
ATTORNEY AT LAW  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA STREET, 17TH FLOOR  
FLOOR  
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL  
ATTORNEY AT LAW  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA STREET, 17TH  
SAN FRANCISCO, CA 94111

JOHN A. GUTIERREZ  
COMCAST  
12647 ALCOSTA BOULEVARD, SUITE 200  
SAN RAMON, CA 94544

JOSEPHINE WONG  
APEX TELECOM INC.  
PO BOX 1917  
OAKLAND, CA 94604

C. HONG WONG  
APEX TELECOM, INC.  
113 10TH STREET  
1035  
OAKLAND, CA 94607

LATANYA LINZIE  
COX CALIFORNIA TELCOM, L.L.C.  
2200 POWELL STREET, SUITE  
EMERYVILLE, CA 94608

CHRIS VAETH  
ATTORNEY AT LAW

MELISSA W. KASNITZ  
DISABILITY RIGHTS ADVOCATES



THE GREENLINING INSTITUTE  
FLOOR  
1918 UNIVERSITY AVE., 2ND FLOOR  
BERKELEY, CA 94704

2001 CENTER STREET, THIRD  
BERKELEY, CA 94704-1204

LORRIE BERNSTEIN  
PINNACLES TELEPHONE COMPANY  
INC.  
340 LIVE OAK ROAD  
PAICINES, CA 95043-9998

EDWARD J SCHNEIDER, JR  
FORESTHILL TELEPHONE CO.,  
4655 QUAIL LAKES DR.  
STOCKTON, CA 95207

LYNNE MARTIN  
PAC-WEST TELECOMM, INC.  
1776 MARCH LANE, SUITE 250  
100  
STOCKTON, CA 95207

LORRIE BERNSTEIN  
MOSS ADAMS LLP  
3121 WEST MARCH LANE, STE.  
STOCKTON, CA 95219-2303

YVONNE SMYTHE  
CALAVERAS TELEPHONE COMPANY  
PO BOX 37  
COPPEROPOLIS, CA 95228

LINDA COOPER  
GLOBAL VALLEY NETWORKS, INC.  
4918 TAYLOR COURT  
TURLOCK, CA 95380

ROSE CULLEN  
THE VOLCANO TELEPHONE COMPANY  
PO BOX 1070  
PINE GROVE, CA 95665-1070

LINDA LUPTON  
REGULATORY MANAGER  
SUREWEST TELEPHONE  
PO BOX 969  
ROSEVILLE, CA 95678

JOLEEN HOGAN  
CAL-ORE TELEPHONE COMPANY  
COMPANY  
PO BOX 847  
DORRIS, CA 96023

JAMES LOWERS  
THE SISKIYOU TELEPHONE  
PO BOX 157  
ETNA, CA 96027

GAIL LONG  
TELEPHONE COMPANY  
HAPPY VALLEY/HORNITOS/WINTERHAVEN  
PO BOX 1566  
OREGON, OR 97045

## Information Only

ADRIENNE M. MERCER  
REGULATORY COMPLIANCE ANALYST  
SAGE TELECOM, INC.  
805 CENTRAL EXPRESSWAY S, STE 100  
ALLENT, TX 75013

BETTINA CARDONA  
PRESIDENT  
FONES4ALL CORPORATION  
6320 CANOGA AVE, SUITE 650  
WOODLAND HILLS, CA 91367

ESTHER NORTHRUP  
COX CALIFORNIA TELCOM  
5159 FEDERAL BLVD.  
SAN DIEGO, CA 92105

GLENND KOUNTZ  
REGULATORY ASSISTANT  
KERMAN TELEPHONE CO.  
811 S. MADERA AVENUE  
KERMAN, CA 93630

JULIE WEIGAND  
RICHARD HEATH AND ASSOCIATES, INC.  
590 W. LOCUST AVENUE, SUITE 103  
FRESNO, CA 93650

MARGARET L. TOBIAS  
ATTORNEY AT LAW  
TOBIAS LAW OFFICE  
460 PENNSYLVANIA AVENUE  
SAN FRANCISCO, CA 94107

SUZANNE TOLLER  
ATTORNEY AT LAW  
COMPANY  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533

LAW DEPARTMENT FILE ROOM  
PACIFIC GAS AND ELECTRIC  
  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442

ROBERT GNAIZDA  
POLICY DIRECTOR/GENERAL COUNSEL  
AFFAIRS  
THE GREENLINING INSTITUTE  
TELECOMMUNICATIONS  
1918 UNIVERSITY AVENUE, SECOND FLOOR  
BERKELEY, CA 94704

CHARLES E. BORN  
MANAGER-STATE GOVERNMENT  
  
FRONTIER, A CITIZENS  
  
PO BOX 340  
ELK GROVE, CA 95759

JOE CHICOINE  
MANAGER, STATE GOVERNMENT AFFAIRS  
FRONTIER COMMUNICATIONS  
PO BOX 340  
ELK GROVE, CA 95759

## State Service

ANGELA YOUNG  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
FISCAL & ADMINISTRATIVE SERVICES  
COMPLIANCE BRAN  
AREA 3-E  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DONNA L. WAGONER  
CALIF PUBLIC UTILITIES  
  
UTILITY AUDIT, FINANCE &  
  
AREA 3-C  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
TRANSMISSION PERMITTING & RELIABILITY BR  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JESSICA T. HECHT  
CALIF PUBLIC UTILITIES  
  
ADMINISTRATIVE BRANCH  
ROOM 2013  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOSIE WEBB  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
TRANSMISSION PERMITTING & RELIABILITY BR  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KAREN A. DEGANNES  
CALIF PUBLIC UTILITIES  
  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KAREN JONES  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
PLANNING  
ROOM 2106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARK A VANDERVELDEN  
CALIF PUBLIC UTILITIES  
  
DIVISION OF STRATEGIC  
  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSION  
TELECOMMUNICATIONS & CONSUMER ISSUES BRA  
COMPLIANCE BRAN  
ROOM 4108  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SEAN WILSON  
CALIF PUBLIC UTILITIES  
  
UTILITY AUDIT, FINANCE &  
  
AREA 3-C  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

---

[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)